

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION**

HUMAN RIGHTS DEFENSE CENTER,

Plaintiff,

v.

LEWIS HATCHER, et al.,

Defendants.

Case No.: 7:17-cv-164-D

**NOTICE OF FILING: RULE 68 OFFER OF
JUDGMENT AND ACCEPTANCE**

Plaintiff Human Rights Defense Center, by and through its undersigned counsel, hereby files this Notice of its Acceptance of Defendants' Rule 68 Offer of Judgment.

Pursuant to Rule 68(a) of the Federal Rules of Civil Procedure, Plaintiff has attached to this filing the Defendants' Rule 68 Offer of Judgment, served on December 13, 2017 (Exhibit 1), and Plaintiff's Acceptance of Defendants' Rule 68 Offer of Judgment, served on December 22, 2017 (Exhibit 2). Both the offer and acceptance include proof of service in the form of certificates of service by counsel.

Pursuant to Rule 68(a), the Clerk is respectfully requested to enter judgment for Plaintiff and against Defendants Lewis Hatcher, in his individual and official capacities, and Clem Thompson, in her individual and official capacities, together. The amount of the judgment against these Defendants is \$25,000.01.

This 22nd day of December, 2017.

ELLIS & WINTERS LLP

/s/ Paul M. Cox
Paul M. Cox, NC Bar # 49146
paul.cox@elliswinters.com

Jonathan D. Sasser, NC Bar # 10028
jon.sasser@elliswinters.com
P.O. Box 33550
Raleigh, NC 27636
Tel: (919) 865-7000
Fax: (919) 865-7010

DAVIS WRIGHT TREMAINE LLP

Bruce E. H. Johnson, WA Bar #7667*
brucejohnson@dwt.com
1201 Third Avenue, Suite 2200
Seattle, WA 98101
Tel: (206) 757-8069
Fax: (206) 757-7069

HUMAN RIGHTS DEFENSE CENTER

Sabarish Neelakanta, FL Bar #26623*
sneelakanta@hrdc-law.org
Masimba Mutamba, FL Bar #102772*
mmutamba@hrdc-law.org
Daniel Marshall, FL Bar # 617210*
dmarshall@hrdc-law.org
P.O. Box 1151
Lake Worth, FL 33460
Tel: (561) 360-2523
Fax: (866) 735-7136

Counsel for Plaintiff Human Rights Defense Center

*Special Appearance counsel per Local Rule 83.1(e).

CERTIFICATE OF SERVICE

This is to certify that the undersigned counsel has this date electronically filed the foregoing using the CM/ECF system which will send notification of such filing to all counsel of record that have made an appearance in this case.

This 22nd day of December, 2017.

/s/ Paul M. Cox

Counsel for Plaintiff Human Rights Defense Center